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June 23, 2020

BY ECF

Honorable Katharine H. Parker
United States Magistrate Judge
United States District Judge Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Zeng v. Chell, et al.,
19-CV-3218 (JGK)

Your Honor:

I am an Assistant Corporation Counsel in the office of James E. Johnson, Corporation Counsel of the City of New York, and the attorney assigned to the defense of the above-referenced matter. In that capacity, the undersigned writes to provide the Court of the status of this matter pursuant to the Court's April 27, 2020 Order. (See Civil Docket Entry No. 39). Pursuant to the Court's April 27, 2020 Order, defendant provides the following:

Since April 27, 2020, in light of the continuing COVID-19 public health crisis, the New York City Law Department continues to require that its non-essential employees work from home. Additionally, on April 30, 2020 defendants sent plaintiff a Notice of Deposition and Defendants' First Set of Interrogatories and Request for Production of Documents via email. Pursuant to F.R.C.P. 33 and 34, plaintiff was obligated to respond to said discovery demands within thirty (30) days of service, by June 1, 2020. On June 9, 2020 the undersigned attempted to call plaintiff to confer about the belatedness of her responses; however, no one picked up the phone. That same day the undersigned emailed plaintiff and requested that she send her discovery responses to the undersigned by June 12, 2020. Plaintiff replied via email and requested an extension of time until June 26, 2020 to send her discovery responses to the undersigned. The undersigned consented to this request. On June 19, 2020 plaintiff emailed the

undersigned and requested an additional 30 days until July 26, 2020 to send her discovery responses to the undersigned. The undersigned consented to a two-week extension until July 10, 2020 for plaintiff to send her discovery responses to the undersigned because the Court did not stay discovery and discovery is set to end on November 19, 2020. (See Civil Docket Entry No. 39).

Additionally, on May 20, 2020 plaintiff emailed the undersigned and requested an extension of time from May 31, 2020 until June 30, 2020 to amend the pleadings or join additional parties. The undersigned consented to this request. On May 21, 2020, plaintiff filed a letter to the Court asking for an extension of time from May 31, 2020 until June 30, 2020 to amend the pleadings or join additional parties. (See Civil Docket Entry No. 40). Although the Court did not rule on plaintiff's first request for an extension to file an Amended Complaint, on June 19, 2020 plaintiff emailed the undersigned for her consent for yet another extension until July 30, 2020 to amend the pleadings or join additional parties. Nonetheless, the undersigned consented to a two-week extension until July 14, 2020 for plaintiff to amend the pleadings or join additional parties because the Court did not stay discovery and discovery is set to end on November 19, 2020. (See Civil Docket Entry No. 39).

Respectfully submitted,

Stephanie De Angelis /s/

Stephanie De Angelis

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cc: By E-MAIL
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